## COMPLAINT EXHIBIT A

## LAW OFFICES OF JERRY C. EFFREN

Jerry C. Effren
Neal J. Bingham

Paralegals

Margaret L. Burchard Adrianne Cormier 25 West Union Street Ashland, Massachusetts 01721 (508) 881-4950 – Telephone (508) 881-7563 – Telecopier E-Mail Address: nbingham@effren.net

August 18, 2021

## VIA EMAIL

Division of Legislation and Regulations U.S. Department of Transportation Maritime Administration Second Floor, West Building 1200 New Jersey Ave., SE, W24-233 Washington, DC 20590

Re: FREEDOM OF INFORMATION ACT REQUEST

Dear Sir or Madam:

I am counsel for Waleed Sayed of Ashland, Massachusetts and I write on his behalf. This is a request by Mr. Sayed under the Freedom of Information Act directed to the Maritime Administration (MARAD). Mr. Sayed hereby requests that a copy of the following documents be provided to him, care of this law office, on an expedited basis:

- 1. All documents evidencing the certification status of the Floating Dry Dock "Alabama" (the "Alabama Dry Dock") at the shipyard owned and/or operated by Alabama Shipyard, LLC. in Mobile, Alabama on and after November 26, 2019.
- 2. The complete two (2) page dry dock certification utilized by Military Sea Command (MSC), Naval Sea Systems Command (NAVSEA), or MARAD to authorize the drydocking of SS Altair beginning in April of 2020 in the Alabama Dry Dock. With respect to this request, the responsive documents should include, to the extent set forth on said responsive documents, the responsive documents must include:
  - a. The certificate's start date and expiration date;
  - b. The tables attached to any of the certifications should include the data required for MARAD to have validated the capacity of the Alabama Dry Dock; and

- c. The "Date", "Job No.", and "By" located on the attached table.
- 3. All documents concerning the "self-certification" of the Alabama Dry Dock by MSC, NAVSEA, or MARAD, or at the direction of MSC, NAVSEA, or MARAD, if any, undertaken or completed on or after November 26, 2019.
- 4. All documents concerning United States Navy certifications of the Alabama Dry Dock, if any, undertaken or completed on or after November 26, 2019.

In order to assist MARAD in determining fees, please be advised that my client is willing to pay fees up to \$250.00 for your services in responding to this request. If you expect the fees will exceed this, please contact me before proceeding.

If you need to discuss this request, I can be reached at the telephone number set forth above during regular business hours. Thank you for your consideration of this request.

WALEED SAYED
By his attorney

, ,

Neal J. Bingham

LAW OFFICES OF JERRY C. EFFREN

cc: Waleed Sayed